

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|  |   |                      |
|--|---|----------------------|
| In the Matter of                       | ) |                      |
|  | ) |                      |
| Revision of the Commission's Rules     | ) | CC Docket No. 94-102 |
| To Ensure Compatibility with           | ) |                      |
| Enhanced 911 Emergency Calling Systems | ) |                      |

To: Wireless Telecommunications Bureau

**ERRATA**

On September 20, 2001, Cordova Telephone Cooperative, Inc. ("Cordova") filed with the Federal Communications Commission ("FCC" or "Commission") a petition for limited waiver of Sections 20.18(e) and (g) of the Commission's rules with regard to its cellular affiliate. The petition was mistakenly filed under the name of the corporate parent (Cordova Telephone Cooperative, Inc.) rather than its cellular subsidiary, Cordova Wireless Communications, Inc. (TRS #818738).

Please find attached replacement pages 1, 11 and the Declaration of Paul Kelly which contain the correct entity name. We request that these pages be inserted in the petition in place of the original pages. We apologize for any inconvenience this has caused the Commission.

Respectfully submitted,

**CORDOVA WIRELESS  
COMMUNICATIONS, INC.**

By: \_\_\_\_\_/s/\_\_\_\_\_

Michael Bennet  
Bennet & Bennet, PLLC  
1000 Vermont Avenue, NW  
Tenth Floor  
Washington, DC 20005

Dated: November 1, 2001

Its Attorneys

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|   |   |                             |
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| <b>In the Matter of</b>                       | ) |                             |
|   | ) |                             |
| <b>Revision of the Commission's Rules</b>     | ) | <b>CC Docket No. 94-102</b> |
| <b>To Ensure Compatibility with</b>           | ) |                             |
| <b>Enhanced 911 Emergency Calling Systems</b> | ) |                             |
|   | ) |                             |

**To:   Wireless Telecommunications Bureau**

**Cordova Wireless Communications, Inc. Petition for Waiver  
of Sections 20.18(e) and (g) of the Commission's Rules**

Cordova Wireless Communications, Inc. ("Cordova"), by its attorneys and pursuant to Sections 1.3 and 1.925 of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission"),<sup>1</sup> hereby requests a temporary waiver of Sections 20.18(e) and (g) of the Commission's rules.<sup>2</sup> Cordova is a small, rural carrier serving the Gulf of Alaska and limited surrounding areas. Cordova is fully committed to meeting the emergency needs of its customers and continues to devote substantial resources and personnel to its pursuit of Phase II E911 ("Phase II") compliance. However, due to its unique circumstances, Cordova is unable to comply with the FCC's current Phase II compliance deadlines.

Deployment of Phase II capability has been particularly difficult for Cordova due to obstacles it has faced in its attempts to obtain the Phase II handset, cell site, network signaling, switching and location equipment, and software upgrades necessary to make Phase II a reality prior to the Commission's October 1, 2001 deadline. Specifically, vendor delays in the availability of Phase II compliant network solutions and Phase II capable handsets have made

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<sup>1</sup> 47 C.F.R. §§ 1.3 and 1.925.

<sup>2</sup> 47 C.F.R. §§ 20.18(e) and (g).

change or when it will no longer be able to rely upon its analog switch, Cordova can be reasonably certain that it cannot afford to purchase the Nortel DMS10 for at least three years without risking its financial survival. Accordingly, Cordova requests that the deadline for Cordova to begin selling and activating handsets be extended to October 1, 2004, the 25 percent benchmark be extended until December 31, 2004, that the 50 percent benchmark be extended until June 30, 2005, and that the 100 percent benchmark be extended until December 31, 2005. Cordova also requests that the 95 percent penetration rate deadline be extended until December 31, 2008.

## V. Conclusion

Based on the foregoing, Cordova respectfully requests that the Commission grant Cordova a temporary waiver of Sections 20.18(e) and (g) of its rules and permit Cordova to implement its Phase II solution based on the schedule set forth herein.

Respectfully submitted,

**CORDOVA WIRELESS  
COMMUNICATIONS, INC.**

By: /s/

Michael R. Bennet  
Bennet & Bennet, PLLC  
1000 Vermont Avenue, NW  
Tenth Floor  
Washington, DC 20005  
202-371-1500

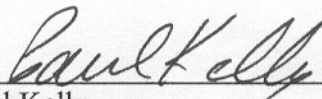
## Its Attorneys

Dated: September 21, 2001

## DECLARATION OF PAUL KELLY

I, Paul Kelly, do hereby declare under penalty of perjury the following:

1. I am the General Manager of Cordova Telephone Cooperative, Inc.
2. In October 2000, I directed my staff to prepare and file a November 9, 2000 Carrier Implementation Report requirement indicating Cordova's handset-based technology choice. It is my recollection that Cordova had then tasked our law firm at that time to file the report on behalf of Cordova, and that the report was timely filed.
3. I have read the foregoing "Motion for Leave to Accept Late Filed Report." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

  
Paul Kelly

Date: 10-26-2001